

UNITED STATES DISTRICT COURT
DISTRICT OF NEW HAMPSHIRE

UNITED STATES OF AMERICA)	
)	Docket no. 21-cr-41-JL
v.)	
)	
IAN FREEMAN)	
_____)	

UNITED STATES' SUPPLEMENTAL JURY
INSTRUCTION REGARDING OTHERS WHO MAY BE UNCHARGED

Your sole task is to decide whether the government has proved beyond a reasonable doubt that the defendant is guilty of the crimes charged in the Superseding Indictment. It is not up to you to decide whether anyone who is not on trial in this case should be prosecuted for a crime. The fact that another person also may be guilty of an offense is no defense to a criminal charge.¹

Respectfully submitted,

Dated: December 13, 2022

JANE E. YOUNG
United States Attorney

By: /s/ Seth R. Aframe
Seth R. Aframe
Assistant United States Attorney
53 Pleasant Street, 4th Floor
Concord, NH 03301
Seth.aframe@usdoj.gov

¹ United States v. Cortez-Nieto, 43 F.4th 1034, 1042 (10th Cir. 2022).